REMARKS

Favorable consideration and allowance of claims 1-3, 5-19, 22-29, and 31-33 are respectfully requested in view of the foregoing amendments and the following comments.

Claims 1-3, 5-19, 22-29, and 31-33 are pending in the application.

Claims 1-3, 5-14, 16-19, 21-29 and 31-33 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bharat (U.S. Patent 6,577,735) in view of Golan (U.S. Patent 5,974,549).

Applicants thank the Examiner for conducting a personal interview with Applicants' representative on October 5, 2006. During the interview, the claim rejection was discussed with regard to the teachings of Bharat and Golan. Applicants' representative pointed out that Golan discloses intercepting API requests from a software component after the software component has already been downloaded from the Internet. Thus, the Examiner's identification of intercepting I/O requests from a computer to an external storage media drive connected across the Internet does not correspond to the claimed intercepting an I/O request from the computer to an external storage media drive. The Examiner agreed with this argument and indicated during the interview that the rejection would be withdrawn in response to the Applicants' formal reply to the Office Action. Therefore, claim 1 is allowable over the combined teachings of Bharat and Golan.

During the interview, the Examiner noted that claims 18, 19, 21 and 32 claim a "computer readable medium" and suggested that these claims be amended to recite a "computer readable storage medium" to avert any potential 35 U.S.C. § 101 problems. In response to the Examiner's suggestion, Applicants amend claims 18, 19, 21 and 32 as suggested.

Applicants provide the following additional comments with regard to the rejection.

Applicants submit that there is no teaching, suggestion, or motivation to combine the teachings of Bharat and Golan. The Examiner asserts that it is obvious that the teachings of Bharat would have been further protected from unknown software loaded from an external source as disclosed by Golan, but Applicants respectfully disagree.

Bharat relates to a system for accessing a known source of audio data from a CD inserted into a CD-ROM drive of a computer, creating an encrypted backup copy of compressed audio data, storing the backup copy on the hard drive of the computer, and downloading the compressed audio data onto a portable audio player from the computer. By creating the encrypted backup copy, the inconvenience of re-loading lost data onto the portable audio player can be reduced, and illicit duplication of the audio data can be avoided.

By contrast, Golan relates to a security monitor for monitoring unknown software downloaded from an external source, such as the Internet, to a computer. Golan creates a "secure sandbox" around the downloaded software to

monitor its execution. Golan's teachings of monitoring the execution of an unknown software downloaded to a computer are unrelated to the teachings of Bharat of creating a backup copy of known audio data downloaded to a portable audio player.

One of ordinary skill in the art would not have been motivated to modify the teachings of Bharat to add the "secure sandbox" of Golan, because Bharat simply copies and encrypts known audio data without any concern for monitoring the execution of a software component. In other words, there is no need or use for Golan's "secure sandbox" in Bharat, and thus modifying Bharat by the teachings of Golan would unnecessarily complicate Bharat's system. Accordingly, there is no teaching, suggestion or motivation to combine the teachings of Bharat and Golan. Therefore, claim 1 is allowable for this additional reason.

Independent claims 18 and 22 are allowable over the prior art for reasons analogous to those for claim 1.

Claims 2, 3, 5-14, 16, 17, 19, 21, 23-29, and 31-33 are allowable at least because of their dependence from claims 1, 18, and 22, respectively.

If there are any questions regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

If necessary to effect a timely response, this paper should be considered as a petition for an Extension of Time sufficient to effect a timely response, and

please charge any deficiency in fees or credit any overpayments to Deposit

Account No. 05-1323 (Docket #101873.56480US).

Respectfully submitted,

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